

EASTERN DISTRICT OF VIRGINIA

ALEXANDRIA DIVISION

UNITED STATES OF AMERICA)

)

)

v.)

)

Case no. 1:14-CR-306-GBL - 8

)

Defendant **GUEVARA'S**

)

MANUEL E. PAIZ GUEVARA)

**MEMORANDUM IN SUPPORT OF DEFENDANT'S
MOTION FOR VIDEORECORDING OF ALL FOREIGN SPEAKING
WITNESSES**

The defendant has moved for an order directing that all foreign or non-English speaking witness have their testimony video recorded and audio recorded and that such recording be made a part of the official record of the case in the event of appeal. Defendant has asserted that the only method of preserving the actual words of the witnesses is by such recording. When a non-English speaking witness testifies, through an interpreter, the words of the witness are absent from the record.

18 U.S.C. § 753 requires that the court record verbatim all proceedings in criminal cases.

The defendant is statutorily permitted to have available a transcript or some other memorialization of the evidence and the rulings of the court. See Rules 4 and 10, Fed. R. App. Pro.

The best interpretation services require that an interpreter, skilled in both the source language, the language of the witness and the target language, the language of the court and attorneys in this instance, substitute for the witness words in the target language to approximate the thoughts of the witness. The process, though impressive, can be imprecise. See the Federal Court Interpreter Orientation Manual and Glossary, Administrative office of the United States Courts, Chapter 3: Overview of Court Interpreting.

That the only method of recording and preserving the actual words and ideas chosen by the under oath witness is to have the testimony and interpretation electronically record.

For such electronic record the defendant now moves.

Respectfully submitted,

MANUAL E. PAIZ GUEVARA

By: _____(s)_____

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Notice of Appearance was duly served, June 4, 2013, upon:

Stephen M. Campbell, Esq.
Julia K Martinez, Esq.
Assistant United States Attorneys
Eastern District of Virginia
2100 Jamison Avenue
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And all other defendants in this matter by the Court's electronic filing system.

/s/ David P. Baugh
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